

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**IN RE:** §  
§  
**THE VAL-ELIZ CHILDREN'S TRUST,** § **CASE NO. 22-30074-hcm**  
§  
**Debtor.** § **CHAPTER 11**

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**DEBTOR'S LIST OF WITNESSES AND EXHIBITS  
(KCMR HOLDINGS, LLC)**

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**TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:**

COMES NOW THE VAL-ELIZ CHILDREN'S TRUST (hereinafter referred to as the "Debtor"), the Debtor in the above-numbered proceeding under Chapter 11 of the Bankruptcy Code, by and through its attorney of record, and hereby files this Debtor's List of Witnesses and Exhibits, for the Hearing scheduled for March 9, 2022, at 1:30 PM MST, on the Motion of KCMR Holdings, LLC For Relief From Stay To Continue Eviction Proceedings And Waiver Of 30-Day Requirement (DOC #14), as follows:

**WITNESSES:**

1. Valor D. Blazer
2. Elizabeth Blazer
3. Robert Rayon, Manager of KCMR Holdings, LLC

**EXHIBITS:**

EXHIBIT A. 2021-11-17 El Paso County Sheriff's Department Sheriff's Deed

EXHIBIT B. 2020-09-02 Final Judgment

EXHIBIT C. 2021-11-15 EPCAD 2021 Results – 5700 Flager Street

EXHIBIT D. 5700 Flager Street Comparative Market Analysis

EXHIBIT E. 2008-03-04 Special Warranty Deed

EXHIBIT F. Letter to Nassim Salloum

EXHIBIT G. 2022-01-31 Return of Service (Unserved)

EXHIBIT H. 2022-02-01 Motion For Substitute Service and Order

EXHIBIT I. 2022-01-31 Email from Rayon

EXHIBIT J. 2022-01-27 Verification – Plaintiff's Original Petition

EXHIBIT K. 2022-02-04 Suggestion of Bankruptcy

EXHIBIT L. 2006-02-01 VAL-ELIZ Children Trust

EXHIBIT M. Residence Homestead Exemption Application by Valor Blazer

The Debtor hereby reserves the right to offer any other exhibits or testimony that is either

(a) designated by KCMR Holdings, LLC in its witness and exhibit list, or (b) necessary and appropriate as rebuttal evidence.

March 3, 2022

Respectfully submitted,

**THE NEVAREZ LAW FIRM, PC**  
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/s/ Michael R. Nevarez  
By: **MICHAEL R. NEVAREZ**  
State of Texas Bar No. 14933400

Attorney for Debtor

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **DEBTOR'S LIST OF WITNESSES AND EXHIBITS (KCMR HOLDINGS, LLC)** was served either by electronic means as listed on the Court's CM/ECF filing and noticing system, and/or by regular first-class mail, postage prepaid, to the following parties in interest, on or before March 3, 2022:

### **COUNSEL FOR CREDITOR:**

James W. Brewer  
Kemp Smith LLP  
P.O. Drawer 2800  
El Paso, TX 79999-2800  
Email: [James.brewer@kempsmith.com](mailto:James.brewer@kempsmith.com)

### **OFFICE OF THE U.S. TRUSTEE:**

Mr. James Rose  
615 E. Houston Street, Suite 533  
San Antonio, TX 78205  
Email: [James.Rose@usdoj.gov](mailto:James.Rose@usdoj.gov)

### **DEBTOR-IN-POSSESSION:**

The Val-Eliz Children's Trust  
5700 Flager Street  
El Paso, TX 79938

### **TOP 20 UNSECURED CREDITORS ALL SECURED CREDITORS**

/s/ Michael R. Nevarez  
**MICHAEL R. NEVAREZ**